

From: John Quinn (Massachusetts) [Quinnj@api.org]
Sent: Tuesday, February 15, 2011 12:42 PM
To: Keith, Glenn (DEP)
Subject: REGIONAL HAZE

The Massachusetts Petroleum Council (MPC) represents a number of refiner/marketers that provide heating oil to terminals in the commonwealth and to terminals in surrounding states.

MPC has a suggestion to improve the specific language of the regulation in its formal SIP promulgation. DEP's Regional Haze SIP uses broad language for the effective date for the two phases of Sulfur reduction. The SIP states that Massachusetts commits to effective dates for the first phase as "by 2014" for the initial reduction to 500 PPM S and 1% S for home heating oil and #4 & #6 residual fuels respectively, and "by 2018" for the final phase that achieves the 15 PPM S and 0.5%.

MPC urges DEP to coordinate the effective dates with the similar regulation recently adopted in New Jersey (NJAC 7:27-9). The NJ Department of Environmental Protection chose effective dates of July 1, 2014 and July 1, 2018 for the two phase-in dates. These specific dates were chosen to avoid a potential disruption in the supply chain by imposing a stricter Sulfur specification during the middle of the winter heating season.

We appreciate both the opportunity to provide comment on this important policy decision and also the inclusive stakeholder process implemented by DEP in this SIP amendment .

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